

EXHIBIT J

<p>1 UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF MASSACHUSETTS 3 MDL Docket No. 1629 4 Master File No. 04-10981 5 ***** 6 IN RE: NEURONTIN MARKETING, SALES 7 PRACTICES AND PRODUCTS 8 LIABILITY LITIGATION 9 ***** 10 THIS DOCUMENT RELATES TO: 11 Bulger v. Pfizer, Inc., Et Al 12 Case No. 07-11426-PBS 13 and 14 Smith, Et Al v Pfizer, Et Al 15 Case No. 05-CV-11515-PBS 16 ***** 17 VIDEOTAPED DEPOSITION OF CHARLES KING, III 18 Held At: 19 Greylock McKinnon Associates 20 One Memorial Drive 21 Cambridge, Massachusetts 22 October 28th, 2008 23 9:05 A.M. 24 Reported By: Maureen O'Connor Pollard, RPR, CLR 25 Videographer: William Slater</p>	<p>1</p>	<p>1 INDEX 2 EXAMINATION PAGE 3 CHARLES KING, III 4 BY MR. MISHKIN 5 5 6 EXHIBITS 7 NO. DESCRIPTION PAGE 8 Exhibit 1 Expert report of Charles 9 King, III..... 4 10 Exhibit 2 One page billing document..... 43 11 Exhibit 3 9/16/02 working paper by 12 Charles King, III..... 58 13 Exhibit 4 Copy of article by Mizik and 14 Jacobson..... 150 15 Exhibit 5 4/4/06 retention letter..... 233 16 Exhibit 6 Group of e-mails..... 233 17 18 19 20 21 22 23 24</p>	<p>3</p>
<p>1 FOR THE PLAINTIFF: 2 BY: RON ROSENKRANZ, ESQ. 3 KEITH ALTMAN, ESQ. 4 FINKELSTEIN & PARTNERS 5 1279 Route 300 6 Newburgh, New York 12551 7 800-634-1212 8 rrosenkranz@lawapm.com 9 10 FOR THE DEFENDANTS: 11 BY: PAUL S. MISHKIN, ESQ. 12 DAVID POLK & WARDWELL 13 450 Lexington Avenue 14 New York, New York 10017 15 212-450-4000 16 paul.mishkin@dpw.com 17 and 18 BY: NICHOLAS P. MIZELL, ESQ. 19 JAMES P. MUEHLBERGER, ESQ. 20 SHOOK, HARDY & BACON 21 2555 Grand Avenue 22 Kansas City, Missouri 64105 23 816-559-2991 24 nmizell@shb.com</p>	<p>2</p>	<p>1 P R O C E E D I N G S 2 3 (Whereupon, King Exhibit Number 1 was 4 marked for identification.) 5 6 THE VIDEOGRAPHER: This is Bill Slater 7 of Veritext. Today's date is October 28th, 8 2008. The time is 9:05 a.m.. 9 We are here at the offices of Greylock 10 McKinnon Associates located at 1 Memorial Drive, 11 Cambridge, Massachusetts to take the videotaped 12 deposition of Charles King, III in the matter of 13 In Re: Neurontin Marketing, Sales Practices and 14 Products Liability Litigation in the United 15 States District Court, District of 16 Massachusetts, MDL Docket Number 1629, Master 17 File Number 04-10981, relating to Bulger versus 18 Pfizer, Incorporated, Et Al, Case Number 19 07-11426-PBS, and Smith, Et Al, versus Pfizer, 20 Et Al, Case Number 05-CV-11515-PBS. 21 Counsel will now voice introduce 22 themselves for the record and state whom they 23 represent, and then the court reporter 24 will swear in the witness.</p>	<p>4</p>

	81		83
<p>1 B?</p> <p>2 A. Yes.</p> <p>3 Q. Let's put aside anything that you 4 might have received after putting in the report. 5 I want to focus with you on the documents that 6 you reviewed before you put in your report. 7 What other documents besides those 8 listed on attachment B did you review in 9 connection with your work in this case?</p> <p>10 A. Well, the attorneys provided me with a 11 hard drive with a daunting number of documents, 12 so there's all sorts of internal company 13 memoranda or e-mail communications or marketing 14 plans or business plans or publication plans, 15 sales analyses, you know, transcripts of 16 conversation, contacts with outside medical 17 education companies. There is a large body of 18 evidence, and I reviewed an awful lot of 19 documents. And out of those, I selected these 20 as examples or as representatives for the points 21 I was trying to make.</p> <p>22 Q. And how did you make that selection?</p> <p>23 A. I tried to find things that I thought 24 were the -- made the point most clearly, most</p>		<p>1 Q. All right. And let's look at --</p> <p>2 A. Other than clerical error.</p> <p>3 Q. Okay. Are there other legal documents 4 outside of the -- outside of deposition 5 transcripts that you specifically relied upon 6 for purposes of your opinion in this case that 7 are not reflected in this list?</p> <p>8 A. No.</p> <p>9 Q. And then there's another heading here 10 "Bates Documents." Are there any Bates 11 documents that you specifically relied upon for 12 purposes of your opinions expressed in this 13 report that are not listed here on attachment B 14 under the heading "Bates Documents"?</p> <p>15 A. No.</p> <p>16 Q. Have you reviewed the Bulger or Smith 17 amended complaints?</p> <p>18 A. No.</p> <p>19 Q. Do you plan to review them?</p> <p>20 A. I wasn't asked to.</p> <p>21 Q. Do you have any plans to review them 22 in the future?</p> <p>23 A. No.</p> <p>24 Q. Have you reviewed the complaints in</p>	
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<p>1 succinctly, and were representative of what I 2 had discovered in reading various documents.</p> <p>3 Q. All right. Let's talk about the 4 heading under "Legal Documents." Well, let me 5 take a step back first.</p> <p>6 Are there other documents that you are 7 relying upon for purposes of your opinion that 8 you chose not to include in this list of 9 documents relied upon?</p> <p>10 A. You know, there are other documents 11 available that support my opinions, but these 12 are the ones that, you know, I specifically 13 chose to rely upon for the opinions in the 14 report.</p> <p>15 Q. Okay. Did you specifically choose to 16 rely upon any deposition testimony other than 17 the deposition testimony listed here under 18 "Legal Documents"?</p> <p>19 A. Well, the answer should be no.</p> <p>20 Q. Okay. And if you look at -- well, you 21 said "the answer should be no." Do you have any 22 reason to think the answer is something other 23 than no?</p> <p>24 A. No, I don't.</p>		<p>1 any of the personal injury cases?</p> <p>2 A. No.</p> <p>3 Q. Are you familiar with the facts in any 4 of the individual personal injury cases?</p> <p>5 A. No.</p> <p>6 Q. So I take it you're not offering any 7 opinions that are specific to any of the 8 particular personal injury cases, is that right?</p> <p>9 A. That's correct, except that the 10 opinions that I offer here apply to all doctors, 11 so they would apply to the individual doctors in 12 the personal injury cases. But I'm not offering 13 an opinion to a -- concerning a specific 14 personal injury case.</p> <p>15 Q. Have you ever spoken to any of the 16 Plaintiffs in the personal injury cases?</p> <p>17 A. No.</p> <p>18 Q. Have you read any of the deposition 19 transcripts in the personal injury cases?</p> <p>20 A. No.</p> <p>21 Q. Do you plan to read any of those?</p> <p>22 A. Not unless I'm asked to.</p> <p>23 Q. Do you know who the treating 24 physicians were in any of the personal injury</p>	